

1-31-07  
12.3.80.9

## ENVIRONMENTAL REVIEW FORM

Date: January 31, 2007

Name: Craig A. Puljan

Title: Plant Manager

Phone Extension: 225

Department: Administration

Name of new product, new or modified process, new or modified production equipment, new or modified construction project, or new raw material, fuel or proposed chemical:

Kustom 221 Cleaning Solvent instead of Tekusolv II for parts cleaning.

Brief description of proposed change: A new parts washer was purchased and part of the deal was that the vendor provided a cleaning solvent that did not require disposal. The parts washer is of a type that separates out both particulate and oils from the cleaning solvent such that none of the solvent has to be disposed. Periodically, solvent is added. The collected waste products are disposed of per our internal waste management procedures. The cleaning solution was changed from Tekusolv II to Kustom 221. Both are petroleum distillates.

Which of the following conditions will exist from the proposed change? (mark with X)

- ☐ Involves a new raw material, fuel or chemical in the process (Is MSDS attached? ☐)
- ☐ Potentially discharges pollutants to the air, water, or land
- ☐ Generates a hazardous waste
- X ☒ Uses a chemical in the maintenance of the process or equipment
- ☐ Generates a solid waste such as paper, aluminum, plastic, wood or off-spec product
- ☐ Involves an increase in production of intermediate or finished products
- ☐ Eliminates/reduces a bottleneck in the process
- ☐ Non-routine maintenance, repair or replacement
- ☐ Requires installation of new equipment



Submit this form to the Environmental Manager for comments.


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Environmental Manager's Comments and Recommendations (attach any notes):

- Cleaning solvent will be subject to SARA 311/312 reporting requirements.
- Cleaning solvent is not subject to TRI reporting requirements.
- Since the cleaning solvent has a flashpoint >140 F it is not subject to D001 ignitable waste requirements.
- The parts cleaner sink top must be kept closed when not in use due to manufactures recommendations.
- Waste filters and liquids that are generated from the use of the parts washer should be analyzed for appropriate TCLP parameters (metals and VOC's) and flashpoint to determine proper disposal options. (RVV 1/30/07)

Environmental/Safety Manager (Print):

Date: 2/2/07

  
(Signature)

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**Plant Manager's Comments and Recommendations:**

I recommend the use of this material. Comparison of each solvent's MSDS sheets, which are attached, shows that they are very similar in most if not all respects. A benefit that came with purchasing the Kustom 221 was a competitively priced parts washer device that filters the solvent. By getting a new parts washer device we have reduced the amount of universal waste generated for the same amount of solvent used.

Plant Manager (Print):      Craig A. Puljan

Date:    January 31, 2007

  
(Signature)